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FEB 13 2002

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT COURT OF MARYLAND

JONATHAN F. BOOTH

*

CLERK BALTIMORE
U.S. DISTRICT COURT
DISTRICT OF MARYLAND
NIGHT DROP BOX

Plaintiff

*

v.

* Civil Action No.: JFM 02CV160

STATE OF MARYLAND, et al.

*

Defendants

*

MOTION TO EXTEND TIME FOR PLAINTIFF TO RESPOND
TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

The Plaintiff, Jonathan F. Booth, by John B. Stolarz, his attorney, moves for an extension of time to respond to Defendants' Motion for Summary Judgment, and say:

1. Defendants' filed a Motion for Summary Judgment on, or about, January 31, 2002.
2. Plaintiff's response to said motion is due on February 14, 2002.
3. Because the case includes a number of constitutional issues, Plaintiff is unable to respond by the date the motion is due.
4. Plaintiff requests an extension, until February 19, 2002, to respond to Defendants' Motion for Summary Judgment.
5. Defendants' counsel has graciously consented to, and will not oppose, the extension.

Wherefore, Plaintiff prays that the time within which the Plaintiff may respond



to Defendants' Motion for Summary Judgment be extended until February 19, 2002.



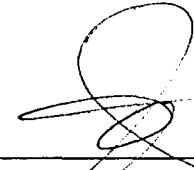
John B. Stolarz
Stolarz & Bricker
6509 York Road
Baltimore, MD 21212
(410) 532-7200

Attorney for Plaintiff

The requested relief is hereby granted this _____ day of February, 2002.

U.S. District Court Judge

to Defendants' Motion for Summary Judgment be extended until February 19, 2002.

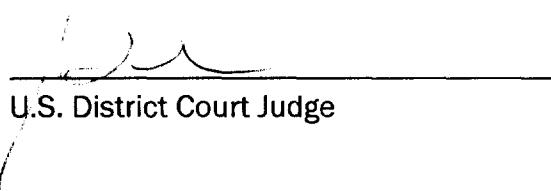


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6509 York Road
Baltimore, MD 21212
(410) 532-7200

Attorney for Plaintiff

The requested relief is hereby granted this 15 day of February, 2002.

U.S. District Court Judge



CERTIFICATE OF SERVICE

I HEREBY CERTIFY That on this 13th day of February, 2002, a copy of Plaintiff's Motion to Extend Time for Plaintiff to Respond to Defendants' Motion for Summary Judgment was served first class mail, postage prepaid, on:

Glenn T. Marrow, Esquire
Offices of The Attorney General
Department of Public Safety
and Correctional Services
Plaza Office Center
6776 Reisterstown Road, Suite 313
Baltimore, MD 21215-2341,

attorney for all Defendants.



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Attorney for Plaintiff